

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)

_____)

THIS DOCUMENT RELATES TO:)

All Actions)

_____)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

**ASSENTED-TO MOTION TO FURTHER EXTEND DEADLINE FOR
RESPONSE TO MOTION FOR ENTRY OF DEPOSITION AND ESI PROTOCOLS**

Saint Thomas West Hospital, formerly known as St. Thomas Hospital, Saint Thomas Network, Saint Thomas Health, Ascension Health Alliance, and Ascension Health (collectively, the “Saint Thomas Entities”), with the assent of the Plaintiffs’ Steering Committee (“PSC”), move for an extension of the deadline for the Saint Thomas Entities to file their response to the Motion for Entry of Deposition and ESI Protocols by Plaintiffs’ Steering Committee (Docket #876) (the “Motion”) to March 7, 2014. In support of this motion, the Saint Thomas Entities state as follows:

1. The Saint Thomas Entities and the PSC have been continuing to meet and confer regarding the issues raised in the Motion. The parties have reached agreement on numerous issues, and they are continuing to meet and confer about the remaining areas of disagreement.
2. This brief extension will help the parties further narrow the areas of dispute for the Court to address.
3. The PSC assents to this short extension.

For these reasons, the Saint Thomas Entities respectfully request, with the assent of the
PSC, that the Court grant their motion and enter an order extending the date for the Saint Thomas
Entities to file their in response to the Motion until March 7, 2014.

Saint Thomas West Hospital,
Saint Thomas Network, Saint Thomas
Health, Ascension Health Alliance, and
Ascension Health

By its attorneys,

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Dated: February 28, 2014

Tennessee Lead Counsel for PSC

CERTIFICATE OF SERVICE

I certify that, on February 28, 2014, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Sarah P. Kelly

Sarah P. Kelly

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